

1 Tony M. Diab
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6 *in pro per*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 VISHAL CHAMARIA, an individual;
11 VIVEK CHAMARIA, an individual; PUJA
12 CHAMARIA, an individual; GAURI
13 CHAMARIA, an individual; P & V, LLC, a
California limited liability company; CHIP
SHOP, LLC, a California limited liability
company,

14 Plaintiffs,

15 vs.

16 TONY M. DIAB, an individual; SHOOK,
17 HARDY & BACON, L.L.P., a Missouri
18 limited liability partnership; MATTHEW
19 GREGORY JONES, an individual; G & M
20 MANAGEMENT SERVICES, INC., a
California corporation, dba JONES REAL
ESTATE; DOES I through X, individuals;
and ROE BUSINESS ENTITIES I through X,
inclusive,

21 Defendants.

Case No.: 2:17-CV-02023-JAD-CWH

22
23 **STIPULATION AND ORDER TO EXTEND TIME TO FILE JOINT RULE 26(f)**
REPORT AND DISCOVERY PLAN (Second Request)

24 Plaintiffs VISHAL CHAMARIA, VIVEK CHAMARIA, PUJA CHARMARIA, GAURI
25 CHAMARIA, P & V, LLC, and CHIP SHOP, LLC (collectively, the “Plaintiffs”), and Defendants
26 MATTHEW GREGORY JONES and G & M MANAGEMENT SERVICES, INC., Tony M.
27 Diab, and Shook, Hardy & Bacon L.L.P., hereby enter into this Stipulation to Extend Time to file
28

1 their Joint Rule 26(f) Report and Discovery Plan (Second Request) pursuant to Fed. R. Civ. P. 6
2 and L.R. IA 6-1 as follows:

3 WHEREAS on July 31, 2017, Mr. Diab filed Defendant Tony M. Diab's Notice of Motion
4 and Motion to Dismiss for Lack of Personal Jurisdiction; Memorandum of Points and Authorities
5 Thereon (the "Diab Motion to Dismiss") (Dkt. 10);

6 WHEREAS on August 8, 2017, Defendants Matthew Gregory Jones and G & M
7 Management Services, Inc. (the "Jones Defendants") filed a Notice of Motion and Motion to
8 Dismiss Complaint Against Defendants Matthew Gregory Jones and G & M Management
9 Services, Inc. for Lack of Personal Jurisdiction (the "Jones Defendants' Motion to Dismiss") (Dkt.
10 20);

11 WHEREAS Plaintiffs' responses to these respective motions were filed on September 8,
12 2017 (Dkts. 38 and 39);

13 WHEREAS the deadline for Defendants' replies to Plaintiffs' responses has been
14 extended until and including September 21, 2017 (Dkts. 40, 41, 44, 45);

15 WHEREAS the parties conducted a Rule 26(f) conference on September 7, 2017;

16 WHEREAS the parties agree that jurisdiction is a threshold issue the resolution of which
17 may alter the scope of this action and thereby affect the content of the parties' Joint Rule 26(f)
18 Report and status report following removal that includes a statement of action to be taken by this
19 Court;

20 WHEREAS the parties believe that a fourteen (14) day extension of the deadline to file
21 their Joint Rule 26(f) Report will not unduly delay the resolution of this matter;

22 IT IS HEREBY STIPULATED that good cause exists to allow the parties until and
23 including October 5, 2017 to file a Joint Rule 26(f) Report.

24 DATED this 21st day of September, 2017.

25 ALEXIS BROWN LAW, CHTD.

26 */s/ Alexis Brown*

27 By: _____
Alexis L. Brown (No. 12338)

28 Attorney for Plaintiffs

1 DATED this 21st day of September, 2017.

2 HOFLAND & TOMSHECK

3 */s/ Bradley Hofland*

4 By: _____
5 Bradley H. Hofland (No. 6343)

6 Attorneys for Matthew Jones and G & M
7 Management Services, Inc.

8 DATED this 21st day of September, 2017.

9 */s/ Tony M. Diab*

10 By: _____
11 Tony M. Diab *in pro per* (No. 12954)

12 DATED this 21st day of September, 2017.

13 LEWIS ROCA ROTHGERBER CHRISTIE
14 LLP

15 */s/ Christopher Jorgensen*

16 By: _____
17 J. Christopher Jorgensen (No. 5382)

18 Attorneys for Shook, Hardy & Bacon L.L.P.

19
20
21 IT IS SO ORDERED.

22
23
24 DATED: September 22, 2017

25  _____
26 U.S. MAGISTRATE JUDGE